

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
EXCO RESOURCES, INC., <i>et al.</i> , <sup>1</sup>	§	Case No. 18-30155 (MI)
	§	
Debtors.	§	(Jointly Administered)
	§	(Emergency Hearing Requested)

**EXCO RESOURCES, INC., *ET AL.*'S  
WITNESS AND EXHIBIT LIST FOR JANUARY 18, 2018 HEARING**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) file their Witness and Exhibit List for the hearing to be held on January 18, 2018, at 2:30 p.m. (prevailing Central Time) (the “Hearing”) as follows:

**WITNESSES**

The Debtors may call the following witnesses at the Hearing:

1. Tyler S. Farquharson, Chief Financial Officer and Treasurer of EXCO Resources, Inc.
2. Michael O’Hara, Partner at PJT Partners LP
3. John Stuart, Managing Director at Alvarez & Marsal North America, LLC
4. Angela Tsai, Director of Consulting of Epiq Bankruptcy Solutions, LLC.
5. Rebuttal witnesses as necessary.

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: EXCO Resources, Inc. (2779); EXCO GP Partners Old, LP (1262); EXCO Holdings (PA), Inc. (1745); EXCO Holding MLP, Inc. (1972); EXCO Land Company, LLC (9981); EXCO Midcontinent MLP, LLC (0557); EXCO Operating Company, LP (1261); EXCO Partners GP, LLC (1258); EXCO Partners OLP GP, LLC (1252); EXCO Production Company (PA), LLC (7701); EXCO Production Company (WV), LLC (7851); EXCO Resources (XA), LLC (7775); EXCO Services, Inc. (2747); Raider Marketing GP, LLC (6366); and Raider Marketing, LP (4295). The location of the Debtors’ service address is: 12377 Merit Drive, Suite 1700, Dallas, Texas 75251.

6. The Debtors reserve the right to cross-examine any witness called by any other party.

**EXHIBITS**

No.	Description	Mark	Offer	Object	Admit	W/D	Disposition After Trial
1.	<i>Declaration of Tyler S. Farquharson, Chief Financial Officer and Treasurer of EXCO Resources, Inc., in Support of Chapter 11 Petitions and First Day Motions [Docket No. 29]</i>						
2.	<i>Declaration of Michael O'Hara in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Secured Financing, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Authorizing the Use of Cash Collateral, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling A Final Hearing, and (VII) Granting Related Relief [Docket No. 28-3]</i>						
3.	<i>Declaration of John Stuart in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Secured Financing, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Authorizing the Use of Cash Collateral, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling A Final Hearing, and (VII) Granting Related Relief [Docket No. 28-4]</i>						
4.	<i>Declaration of Angela Tsai in Support of Application of Debtors for Order Appointing Epiq Bankruptcy Solutions, LLC as Claims, Noticing, Solicitation, and Administrative Agent [Docket No. 7-2]</i>						
5.	<i>DIP Credit Agreement [Docket No. 37]</i>						
6.	<i>Balance Sheet [Docket No. 28-1, Ex. 2 to Proposed Interim DIP Order]</i>						

No.	Description	Mark	Offer	Object	Admit	W/D	Disposition After Trial
7.	<i>DIP Budget</i> [Docket No. 28-1, Ex. 3 to Proposed Interim DIP Order]						
8.	<i>Initial Forecast</i> [Docket No. 28-1, Ex. 4 to Proposed Interim DIP Order]						
9.	<i>Form of RBL Payoff Letter</i> [Docket No. 28-1, Ex. 5 to Proposed Interim DIP Order]						
10.	<i>Attorney Checklist Concerning Motion and Order Pertaining to use of Cash Collateral</i> [Docket No. 28-5, Ex. E]						
11.	<i>Evidentiary Support for First Day Motions</i> [Docket No. 29, Ex. A]						
12.	<i>Corporate Organizational Structure</i> [Docket No. 29, Ex. B]						
13.	Any exhibit introduced by any other party						
14.	Rebuttal exhibits as necessary						

Respectfully Submitted,

Dated: January 17, 2018

/s/ Marcus A. Helt

Marcus A. Helt (TX 24052187)

Telephone: (214) 999-4526

Facsimile: (214) 999-3526

Email: mhelt@gardere.com

Michael K. Riordan (TX: 24070502)

Telephone: (713) 276-5178

Facsimile: (713) 276-6178

Email: mriordan@gardere.com

**GARDERE WYNNE SEWELL LLP**

1000 Louisiana St., Suite 2000

Houston, Texas 77002

- and -

Patrick J. Nash, Jr., P.C. (*pro hac vice* admission pending)

Alexandra Schwarzman (*pro hac vice* admission pending)

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Email: patrick.nash@kirkland.com

alexandra.schwarzman@kirkland.com

- and -

Christopher T. Greco (*pro hac vice* admission pending)

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: christopher.greco@kirkland.com

*Proposed Counsel for the Debtors and Debtors in Possession*

**Certificate of Service**

I certify that on January 17, 2018, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Marcus A. Helt

Marcus A. Helt